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APR 26 1985

5HS-13

CERTIFIED MAIL #P 557 098 102
 RETURN RECEIPT REQUESTED

Larry L. Pirtle, Plant Manager
 Reilly Tar and Chemical Corp.
 P.O. Box 370
 Granite City, Illinois 62040

RE: Corrective Action Requirements,
 Hazardous and Solid Waste
 Amendments of 1984
 Granite City, Illinois
 ILD 006278360

Dear Mr. Pirtle:

As you know, we are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact the previously identified permit writer with our Agency for additional information.

Sincerely yours,

Karl J. Klepitsch, Jr.
 Chief, Solid Waste Branch

Enclosures

INITIALS

DATE

TYPYST

AUTHOR

 ILLINOIS
 STU #1
 CHIEF

 STU #2
 CHIEF

 STU #3
 CHIEF

 TPS
 CHIEF

 WMB
 CHIEF

 WMD
 DIRECTOR

APR 25 1985

 CM 4-25-85
 WMB
 4-25-85

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

AUG 16 1985

IEPA-DLPC

FACILITY NAME: Reilly Tar & Chemical Corporation

RECEIVED

EPA I.D. NUMBER: ILD006278360

JUL 14 1985

LOCATION: Granite City

RECEIVED

STATE: Illinois

SOLID WASTE BRANCH
U.S. EPA, REGION V

JUL 12 1985

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	YES	NO
Landfill		X
Surface Impoundment		X
Land Farm		X
Waste Pile	X	
Incinerator		X
Storage Tank (Above Ground)		X
Storage Tank (Underground)		X
Container Storage Area		X
Injection Wells		X
Wastewater Treatment Units	X	
Transfer Stations		X
Waste Recycling Operations		X
Waste Treatment, Detoxification		X
Other		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

Waste Pile - contains approximately 2000 yards of construction rubble, excavated soil from construction sites and fill dirt. Some of the material has been and continues to be removed from our property. The material will be disposed of in a RCRA Landfill in order to alleviate any future concern. Prior materials were disposed of in a RCRA Secure Landfill.

Wastewater Treatment Units - All wastewater treatment is contained in above ground tanks with treated water discharged to the local POTW.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

COPY 2

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

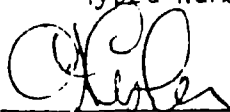
See groundwater analysis supplied in our Part B Application for existing
inactive wastewater lagoon. No data available on rubble piles.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See ground water analysis supplied in our Part B Application for existing
inactive wastewater lagoon. Ongoing assessment is being developed for
this facility.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

C. F. Leshner, Executive Vice President
Typed Name and Title


Signature

24 June 1985
Date

P 557 098 102

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

U.S.G.P.O. 1983-403-517

Sent to Larry L. Pirtle, Plant Manager Reilly Tar and Chemical Corp.	
P.O. Box 370 Granite City, IL. 62040 P.O., State and ZIP Code	
Postage	\$22
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom, Date, and address of Delivery	.70
TOTAL Postage and Fees	\$1.67
Postmark or Date	

H. Witschonke

SHS-12: STU#1: ILD 006278360

PS Form 3811, July 1983

DOMESTIC RETURN RECEIPT

<p>SENDER: Complete items 1, 2, 3 and 4.</p> <p>Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.</p>	
<p>1. <input checked="" type="checkbox"/> Show to whom, date and address of delivery.</p> <p>2. <input type="checkbox"/> Restricted Delivery.</p>	
<p>3. Article Addressed to: Larry L. Pirtle, Plant Manager Reilly Tar and Chemical Corp. P.O. Box 370 Granite City, Illinois 62040</p>	
<p>4. Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input checked="" type="checkbox"/> Express Mail</p>	<p>Article Number P 557098102</p>
<p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	
<p>5. Signature - Addressee X <i>[Signature]</i></p>	
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery 5-1-85</p>	
<p>8. Addressee's Address (ONLY if requested and fee paid)</p>	

H. Witschonke: SHS-12: STU#1: ILD 006278360